



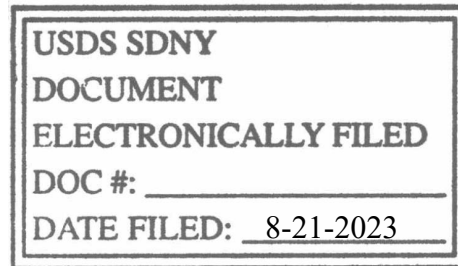
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MEMO ENDORSED

August 16, 2023

VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *United States v. Mauricio Rene Garcia Quimbayo*, 21 Cr. 359 (LAK)

Dear Judge Kaplan:

Defendant Mauricio Rene Garcia Quimbayo respectfully submits this letter motion to join in the motions filed last night by co-defendant Jose Alfredo Aguas Oviedo to the extent they are applicable to him.

Unlike his co-defendants Messrs. Roldan Cardenas and Aguas Oviedo, Mr. Garcia Quimbayo was not employed by the Colombian National Police, nor does he intend to present any public authority defense pursuant to Federal Rule of Criminal Procedure 12.3. However, in addition to the applications to the Court relevant to his public authority defense, Mr. Aguas Oviedo asserts a series of spoliation and *Brady* violations that, according to his motion, warrant dismissal of the case. In support of those motions, among other things, Mr. Aguas Oviedo supplied independent documentary evidence (*See, e.g.*, Horowitz Decl. Exh. K) that suggests a failure of the Drug Enforcement Administration to comply with its disclosure obligations and otherwise preserve evidence. Mr. Aguas Oviedo's spoliation and *Brady* motions would potentially be applicable to all defendants in this matter and, as such, Mr. Garcia Quimbayo joins in them.

Respectfully submitted,

/s/ John T. Zach
John T. Zach / Shannon Prince

cc: Counsel of Record

Granted.
SO ORDERED.
/s/ Lewis A. Kaplan
Lewis A. Kaplan
United States District Court Judge
Dated: August 21, 2023